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EXHIBIT A"

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U.S. DISTRICT COURT ST. PAUL



## UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,	INDICTMENT
Plaintiff,	18 U.S.C. § 922(g)(1)
	18 U.S.C. § 924(a)(2)
v.	18 U.S.C. § 924(d)(1)
	21 U.S.C. § 841(a)(1)
AUGUSTUS QUINTRELL LIGHT,	21 U.S.C. § 841(b)(1)(A) -
a/k/a "Stow,"	21 U.S.C. § 841(b)(1)(C) .
•	21 U.S.C. § 853
Defendant.	28 U.S.C. § 2461(c)

### THE UNITED STATES GRAND JURY CHARGES THAT:

# **COUNT 1**(Possession With Intent To Distribute a Controlled Substance)

On or about December 7, 2019, in the State and District of Minnesota, the defendant,

### AUGUSTUS QUINTRELL LIGHT,

a/k/a "Stow,"

did knowingly and intentionally possess with intent to distribute 50 grams or more of methamphetamine (actual), a controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

# **COUNT 2**(Possession With Intent To Distribute Controlled Substances)

On or about December 7, 2019, in the State and District of Minnesota, the defendant,

### **AUGUSTUS QUINTRELL LIGHT,**

a/k/a "Stow,"

did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of heroin, and a mixture and substance containing a

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detectable amount of cocaine, both of which are controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

# **COUNT 3**(Felon in Possession of Ammunition)

On or about December 7, 2019, in the State and District of Minnesota, the defendant,

### AUGUSTUS QUINTRELL LIGHT,

a/k/a "Stow,"

having previously been convicted of the following felony crimes, each of which was punishable by imprisonment for a term exceeding one year,

Crime	Jurisdiction of Conviction	Date of Conviction (in or about)	
Criminal Vehicular Operation – Substantial Bodily Harm	St. Louis County, MN	January 2002	
Criminal Damage To Property – First Degree	St. Louis County, MN	May 2003	
Felon in Possession of a Firearm	U.S. District Court, District of Minnesota	April 2004	
Possession of Contraband in Prison	U.S. District Court, S.D. Indiana	December 2014	
Terroristic Threats	Hennepin County, MN	March 2018	

and knowing he had been convicted of at least one crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting interstate commerce, ammunition, namely CCI/Speer brand .45 caliber ammunition, all in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

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### FORFEITURE ALLEGATIONS

Counts 1-3 of this Indictment are hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures.

If convicted of an offense alleged in Counts 1 or 2 of this Indictment, the defendant shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853(a)(1) and (2), any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offense and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of that offense, including but not limited to approximately \$4,800 seized from the defendant's residence in Naytahwaush, Minnesota on or about December 7, 2019.

If convicted of an offense alleged in Counts 1, 2, or 3 of this Indictment, the defendant shall forfeit to the United States any firearms, accessories, and ammunition involved in or used in connection with the violation, including but not limited to six rounds of CCI/Speer .45 caliber ammunition, a Sig Sauer Model P226 9mm Luger caliber pistol (serial number 47C008016), and a Hi-Point Model JHP .45 Auto caliber pistol (serial number X4348821), pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c).

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p).

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UNITED STATES ATTORNEY	FOREPERSON	